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Attorneys for Respondent

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANDREW WADSWORTH,

Petitioner,

v.

**MATTHEW C. KRAMER, Warden, and the
ATTORNEY GENERAL OF THE STATE OF
CALIFORNIA,**

Respondents.

C 07-5241 MMC

**DECLARATION OF JEREMY
FRIEDLANDER IN SUPPORT
OF THE EX PARTE
APPLICATION FOR
EXTENSION OF TIME**

1. I am a Deputy Attorney General of the State of California and am the attorney for respondent in the above-entitled case.

2. On October 22, 2007, the Court issued an order to show cause, directing respondent to file an answer and supporting points and authorities in this case within 30 days of service of the order.

3. The Attorney General's Office in San Francisco appears to have received the order on November 1, 2007 (judging from the earliest written notation in our case file), although the order

1 was not docketed until November 5, 2007. In an abundance of caution, I will assume that the office
2 received the order the day it was issued, October 22, making the due date for the response November
3 21, 2007.

4 4. I request an extension of sixty days within which to file the answer and supporting
5 points and authorities. Sixty days from November 21, 2007, is January 20, 2008. However, because
6 that day is a Sunday and the next day a federal holiday, the new due date would be January 22, 2008,

7 5. Since the Court issued its order to show cause, I have filed a petition for certiorari
8 in *Chronos v. Pulido* (07-544; 10/23/07); a motion to recall the mandate in *Pulido v. Chronos* (05-
9 15916; 10/23/07); a respondent's brief in *People v. Rodriguez-Montero* (A116391; 10/26/07), and
10 a court-requested opposition to a writ of habeas corpus in *In re Voelker* (A119178). I have finished
11 drafting and am about to file a respondent's brief in *People v. Maszewski* (A115723).

12 5. I am currently working on a respondent's brief in *People v. Haynes* (A116296).
13 Before reaching this assignment, I must complete a respondent's brief in *People v. Khensokvann et*
14 *al.* (H030770), a case with a lengthy record, and a response to a Rule 60(b) motion in *Yates v. Ryan*
15 (C 04-2445 WHA). I may also be filing a response to the opposition in *Pulido*.

16 6. The instant case appears to require a brief on the merits. It appears to raise four
17 separate claims, including two claims of ineffective assistance of counsel.

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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Dated: November 19, 2007

3 Respectfully submitted,

4 EDMUND G. BROWN JR.
Attorney General of the State of California

5 DANE R. GILLETTE
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6 GERALD A. ENGLER
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7 PEGGY S. RUFFRA
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9
10 /s/ Jeremy Friedlander

11 JEREMY FRIEDLANDER
12 Deputy Attorney General
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